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5 *Attorney for Plaintiff*

6 **UNITED STATES DISTRICT COURT**

7 **CLARK COUNTY, NEVADA**

8 HELEN ARMSTRONG

CASE NO. 2:17-cv-02528

9 Plaintiff,

10 v.

11
12 TERRY REYNOLDS, in his individual capacity
and as Deputy Director of Nevada division of
13 Business and Industry; STEVE GEORGE , in his
individual capacity and as an administrator of the
14 Nevada Division of Industrial Relations;
15 LANKFORD, in his individual capacity and as
Chief Administrative Officer of Nevada OSHA;
16 and LARA PELLEGRINI, in her individual
capacity and as Whistleblower Chief Investigator
17 of Nevada OSHA, DOES I through X, unknown
individuals, and ROES XI through XX, entities,
18 government agencies, corporations, or other
companies and/or businesses currently unknown;
19

20 Defendants.
21

22 **EMERGENCY MOTION OR REQUEST TO EXTEND TIME**

23 COMES NOW, Plaintiff, HELEN ARMSTRONG, and requests this Court to extend the time
24 it has allotted for her to submit an amended complaint setting forth amended causes of action under
25 Counts I, IV, V, VI, and X.
26

27 This Court had the final pleading regarding Defendants' Motion to Dismiss, Defendants'
28 Reply in Support of their Motion to Dismiss, before it on July 23, 2018, a period of 7 ½ months,

1 approximately 224 days. But the Court has only given the Plaintiff 23 days, that is, until March 29,
2 2019, to “cure the defects” present in the Amended Complaint.

4 Plaintiff’s attorney, Joel F. Hansen, recently left his former firm, Cooper Levenson, PA, and
5 formed Hansen & Hansen Lawyers, LLC. The move took place on February 4, 2019. Mr. Hansen
6 has been heavily involved in getting his new firm up and running and has not had the proper amount
7 of time available to work on preparing the response required by the Court. Thus, the necessity of
8 additional time in which to respond to this Court’s order.
9

10 Wherefore, it is respectfully requested that this Court grant an additional 28 days, until and
11 including April 29, 2019, in which Plaintiff may prepare and file the Amended Complaint asked for
12 by this Court. This request is made pursuant to FRCP 6(b).
13

14 DATED this 26th day of March 2019.


15 Respectfully submitted:

16 HANSEN & HANSEN, LLC

17 BY: /s/ Joel F. Hansen
18 JOEL F. HANSEN, ESQ.
19 Nevada Bar No. 1876
20 9030 W. Cheyenne Ave. #210
21 Las Vegas, NV 89129
22 Attorney for Plaintiff

23 IT IS SO ORDERED.

24 DATED: March 26, 2019

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26 _____
27 ANDREW P. GORDON
28 UNITED STATES DISTRICT JUDGE

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